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July 3, 2023

VIA ECF

Application Granted.

The Hon. P. Kevin Castel, United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 1007

So Ordered:


Hon. P. Kevin Castel, U.S.D.J.

7-5-23


Re: *Safe Health Systems, Inc. v. Chris Chierchio, et al.*

Case No. 1:23-cv-05234-PKC

RR File No.: 005858-00004

Dear Judge Castel:

On June 21, 2023, the above-captioned matter was transferred to the United States District Court for the Southern District of New York from United States District Court for the Central District of California and assigned to Your Honor. An Initial Pretrial Conference has been scheduled for September 11, 2023.

This firm was retained following the transfer to this District to represent Defendants Joseph MacLellan and Greenspoon Marder LLP (the "Greenspoon Marder Defendants") in this action. I write to request that the Greenspoon Marder Defendants' time to respond to the Complaint be extended to August 11, 2023, due to the personal and professional commitments of the attorneys handling this matter and the fact that we were just retained. 

On June 27, 2023, I contacted Plaintiff's California attorneys, Callahan & Blaine, APLC, by phone, to request their consent to extend the Greenspoon Marder Defendants' time to respond to the Complaint. On June 28, 2023, I sent a follow-up e-mail, requesting that Plaintiffs consent to an August 11, 2023 response deadline, and was advised that Plaintiff would respond to our request by June 30, 2023, at the latest. However, to date, Plaintiff's counsel has yet to respond. Accordingly, I am unable to apprise the Court as to whether there is consent of all parties to the proposed adjournment. As the proposed Answer deadline is more than fourteen (14) days prior to the scheduled Initial Pretrial Conference, no further changes to the Court's schedule are required.

RIVKIN RADLER LLP

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Based upon the foregoing, it is respectfully requested that this Court So Order that the Greenspoon Marder Defendants' time to respond to the Complaint is extended to August 11, 2023.

Respectfully submitted,

RIVKIN RADLER LLP
Attorneys for Defendants
Joseph MacLellan and
Greenspoon Marder LLP

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